



FEMA Public Assistance Pilot Program

Fiscal Year 2009 Report to Congress
May 20, 2009



Homeland
Security

Federal Emergency Management Agency

Foreword from the Administrator

May 20, 2009

I am pleased to present the following report, “FEMA Public Assistance Pilot Program,” which has been prepared by the Federal Emergency Management Agency.

The report responds to a requirement in the Post Katrina Emergency Management Reform Act (P.L. 109-295) and provide details on the effectiveness of the Public Assistance Pilot Program implemented from June 1, 2007 through December 31, 2008, to (1) reduce the costs to the Federal Government of providing assistance to state and local governments, (2) increase flexibility in grant administration, and (3) expedite the provision of assistance to states and local governments.

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable David E. Price
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Harold Rogers
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Robert C. Byrd
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable George Voinovich
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

The Honorable Bennie G. Thompson
Chairman, House Homeland Security Committee

The Honorable Peter T. King
Ranking Member, House Homeland Security Committee

The Honorable Joseph I. Lieberman
Chairman, Senate Homeland Security Committee

The Honorable Susan Collins
Ranking Member, Senate Homeland Security Committee

The Honorable Eleanor Holmes Norton
Chairman, House Transportation and Infrastructure Committee, Subcommittee on
Economic Development, Public Buildings, and Emergency Management

The Honorable Mario Diaz-Balart
Ranking Member, House Transportation and Infrastructure Committee, Subcommittee on
Economic Development, Public Buildings, and Emergency Management

The Honorable Edolphus Towns
Chairman, House Oversight and Government Reform Committee

The Honorable Darrell Issa
Ranking Member, House Oversight and Government Reform Committee

Inquiries relating to this report may be directed to me at (202) 646-3900 or to the Department's
Acting Chief Financial Officer, Peggy Sherry at (202) 447-5751.

Sincerely,



W. Craig Fugate
Administrator
Federal Emergency Management Agency

Executive Summary

Section 689j of the Post Katrina Emergency Management Reform Act (PKEMRA, P.L. 109-295) directs the Federal Emergency Management Agency (FEMA) to conduct a Public Assistance (PA) Pilot program. Section 689j of PKEMRA established three goals for the PA Pilot program: (1) reduce the costs to the Federal Government of providing assistance to state and local governments, (2) increase flexibility in grant administration, and (3) expedite the provision of assistance to states and local governments.

Before beginning this pilot, FEMA convened a PA Pilot Workgroup, comprised of the representatives of the National Emergency Management Association, the International Association of Emergency Managers, and FEMA regional and headquarters staff, to develop procedures that would reduce costs, increase flexibility and expedite assistance. The PA Pilot Workgroup recommended, and FEMA implemented, the following four pilot procedures:

- Provide grants based on estimates for large projects up to \$500,000.
- Provide an additional five percent federal cost share, not to exceed 100 percent, to applicants that had a FEMA-approved debris management plan and at least two pre-qualified debris and wreckage removal contractors identified prior to the disaster.
- Allow applicants to retain any revenue from the salvage of recyclable disaster debris as an incentive to recycle debris.
- Reimburse the straight- or regular-time salaries of an applicant's permanently employed staff that performed debris-related activities.

FEMA implemented the PA Pilot program from June 1, 2007, through December 31, 2008. During this time, 3,965 applicants over 78 disasters participated in at least one component of the PA Pilot program. FEMA prepared and obligated 5,771 project worksheets (PWs) totaling \$530 million, though it should be noted that some PWs incorporated multiple components.

The statute also directs FEMA to submit a report regarding the effectiveness of the PA Pilot program. In accordance with this requirement, this report outlines:

- An assessment of any administrative or financial benefits of the procedures piloted under the PA Pilot program.
- An assessment of the effect, including any savings in time and cost, of the procedures piloted under the PA Pilot program.
- Any identified legal or other obstacles to increasing the amount of debris recycled after a major disaster.
- Any other findings and conclusions with respect to the procedures piloted under the PA Pilot program.
- Any recommendations for additional authority to continue or make permanent any of the procedures piloted under the PA Pilot program.



FEMA Public Assistance Pilot Program

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I. Legislative Requirement

This document responds to the reporting requirements set forth in Section 689j of the Post Katrina Emergency Management Reform Act (PKEMRA, P.L. 109-295), which states as follows:

(a)(1) The President, acting through the Administrator, and in coordination with State and local governments, shall establish and conduct a pilot program to--

(A) reduce the costs to the Federal Government of providing assistance to States and local governments under sections 403(a)(3)(A), 406, and 407 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 1570b(a)(3), 5172, 5172);

(B) increase flexibility in the administration of sections 403(a)(3)(A), 406, and 407 of that Act; and

(C) expedite the provision of assistance to States and local governments provided under sections 403(a)(3)(A), 406, and 407 of that Act.

(2) Participation.-- Only States and local governments that elect to participate in the pilot program may participate in the pilot program for a particular project.

(3) Innovative administration.----

(A) In general.--For purposes of the pilot program, the Administrator shall establish new procedures to administer assistance provided under the sections referred to in paragraph (1).

(B) New procedures.--The new procedures established under subparagraph (A) may include 1 or more of the following:

(i) Notwithstanding section 406(c)(1)(A) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 1571(c)(1)(A)), providing an option for a State or local government to elect to receive an in-lieu contribution in an amount equal to 90 percent of the Federal share of the Federal estimate of the cost of repair, restoration, reconstruction, or replacement of a public facility owned or controlled by the State or local government and of management expenses.

(ii) Making grants on the basis of estimates agreed to by the local government (or where no local government is involved, by the State government) and the Administrator to provide financial incentives and disincentives for the local government (or where no local government is involved, for the State government) for the timely or cost effective completion of projects under sections 403(a)(3)(A), 406, and 407 of that Act.

(iii) Increasing the Federal share for removal of debris and wreckage for States and local governments that have a debris management plan approved by the Administrator and have pre-qualified 1 or more debris and wreckage removal contractors before the date of declaration of the major disaster.

(iv) Using a sliding scale for the Federal share for removal of debris and wreckage based on the time it takes to complete debris and wreckage removal.

(v) Using a financial incentive to recycle debris.

(vi) Reimbursing base wages for employees and extra hires of a State or local government involved in or administering debris and wreckage removal.

(4) Waiver.-- The Administrator may waive such regulations or rules applicable to the provisions of assistance under the sections referred to in paragraph (1) as the Administrator determines are necessary to carry out the pilot program under this section.

(b) Report.-

(1) In general.-- Not later than March 31, 2009, the Administrator shall submit to the appropriate committees of Congress a report regarding the effectiveness of the pilot program under this section.

(2) Contents.-- The report submitted under paragraph (1) shall include—

(A) an assessment by the Administrator of any administrative or financial benefits of the pilot program;

(B) an assessment by the Administrator of the effect, including any savings in time and cost, of the pilot program;

(C) any identified legal or other obstacles to increasing the amount of debris recycled after a major disaster;

(D) any other findings and conclusions of the Administrator with respect to the pilot program; and

(E) any recommendations of the Administrator for additional authority to continue or make permanent the pilot program.

(c) Deadline for Initiation of Implementation.--The Administrator shall initiate implementation of the pilot program under this section not later than 90 days after the date of enactment of this Act.

(d) Pilot Program Project Duration.--The Administrator may not approve a project under the pilot program under this section after December 31, 2008.

II. Background

Section 689j of PKEMRA authorizes FEMA to conduct a Public Assistance (PA) Pilot program to reduce the costs to the Federal Government of providing assistance to states and local governments; increase flexibility in the administration; and expedite the provision of assistance under Sections 403(a)(3)(A), 406, and 407 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 1570b(a)(3)(A), 5172, 5173 (Stafford Act).

The statute authorizes FEMA to pilot up to six new procedures for the administration of PA grants, and provides FEMA the authority to waive regulations and rules applicable to the provision of assistance. FEMA did not change existing regulations to implement the PA Pilot program. Since this was a voluntary test program that took place for a relatively short period of time, FEMA found it impractical due to time constraints to promulgate regulations. The legislation allows state and local governments to participate in the PA Pilot on a voluntary basis. Applicants were not required to use any procedures, but may have elected to use one or more of the procedures for one or more of its projects. The legislation does not authorize participation by private non-profit applicants. The legislation prohibits approving any pilot projects after December 31, 2008, and directed FEMA to submit a report to Congress regarding the effectiveness of the PA Pilot program no later than March 31, 2009.

FEMA elected not to pilot two of the six procedures authorized by legislation. FEMA chose not to implement a sliding scale for debris removal work to provide incentive to complete the work sooner. FEMA determined that the process of developing a sliding scale would take too long for the purposes of the PA pilot. In addition, the complexities of developing an accurate sliding scale, mainly attributed to the uncertainty of estimating debris, and developing a system that would accommodate small to large jurisdictions and debris events, FEMA questioned anticipated savings and FEMA chose not to pursue this authorized procedure.

FEMA also concluded that implementing an in-lieu contribution procedure would not meet the goals of the legislation (i.e., reducing costs, increasing administrative flexibility and expediting the provision of assistance). Under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Stafford Act), P.L. 93-288, as amended, FEMA provides funding to state or local governments to repair, restore, reconstruct or replace public facilities owned or controlled by the state or local government. If, however, the state or local government determines that the public welfare would not best be served by repairing, restoring, reconstructing or replacing the public facility, it may elect to receive a contribution to use for alternate projects. Any alternate project must either be “to repair, restore, or expand other selected public facilities; to construct new facilities; or to fund hazard mitigation measures that the state or local government determines to be necessary to meet a need for governmental services and functions in the area affected by the major disaster.” Section 609 of the Security and Accountability For Every Port Act of 2006 (SAFE Port Act, P.L. 109-347) amended section 406(c)(1) of the Stafford Act by changing the federal contribution for alternate projects for state and local government applicants from “75 percent of the Federal share” of the eligible costs for public facilities to “90 percent of the Federal share” of the eligible costs for public facilities.

Therefore, FEMA concluded that the in-lieu contribution procedure did not deviate that far from FEMA's existing authorities and practices.

The four procedures FEMA did choose to implement were: Grants Based on Estimates, Increased Federal Share Incentive, Debris Recycling, and Force Account Labor, as detailed below.

Grants Based on Estimates: Under this procedure, FEMA allowed Grants Based on Estimates for large projects up to \$500,000. This procedure allowed states to disburse funds to applicants up front (where state laws allowed for such payments), rather than through the reimbursement of actual costs. These projects were not subject to the appeal process outlined in 44 CFR §206.206, Appeals. Applicants could use this procedure for Category A, Debris Removal, and Categories C-G, Permanent Work. FEMA wanted to determine if this procedure would reduce the time and administrative cost of awarding PA grants, and if it would enable FEMA to expedite assistance to state and local governments.

Increased Federal Share Incentive: Under this procedure, FEMA provided an additional five percent federal cost share for debris removal projects under Sections 403(a)(3)(A) and 407 of the Stafford Act to those applicants that had a FEMA-approved debris management plan and which had pre-qualified two or more debris and wreckage removal contractors. FEMA's objective was to create a financial incentive for applicants to initiate jurisdictionally managed debris removal operations more quickly after a disaster, supported and facilitated by debris management plans and debris contracts established prior to the disaster.

Debris Recycling: The goal of this procedure was to financially incentivize recycling by allowing applicants to retain the revenues generated from recycling disaster-related debris.

Force Account Labor: Under this procedure, FEMA reimbursed straight-time wages for the employees of a state or local government while they performed disaster-related debris and wreckage removal activities. FEMA's objective was to provide applicants an incentive to perform the work in-house, as well as improve oversight of debris removal operations. In addition, FEMA wanted to determine if debris removal operations and monitoring performed by force account labor was less costly and more efficient than contractor operations.

The PA Pilot Program Guidance outlines these processes more fully. FEMA included a copy of the PA Pilot Program Guidance as Appendix A of this report.

III. Results

FEMA implemented the PA Pilot program from June 1, 2007, through December 31, 2008. During this time-period, 3,965 applicants (32 percent of all applicants, which totaled 12,227) in 78 disasters participated in at least one procedure of the PA Pilot program. FEMA prepared and obligated 5,771 PA Pilot Project Worksheets (PW)¹ (19 percent of 29,957 PWs) for Category A, Debris Removal, and Categories C-G, Permanent Work, for \$530 million. Some PWs incorporated multiple procedures. The PW-by-Procedure breakdown is as follows:

- **Grants Based on Estimates:** 383 PWs for \$49.8 million (\$22.8 million for Category A, Debris Removal, work, and \$27 million for Categories C-G, Permanent Work);
- **Increased Federal Share Incentive:** 234 PWs for \$166.9 million;
- **Debris Recycling:** 63 PWs for \$3.2 million; and
- **Force Account Labor:** 5,212 PWs for \$287.5 million.

FEMA used disaster-specific PA Pilot reporting protocols and individual PWs to evaluate the effectiveness of the four PA Pilot program procedures. However, because FEMA had closed very few PWs at the time of this report, the conclusions in this report rely heavily on interviews with States and FEMA Regions, as well as applicant customer surveys and exit briefings.

Grants Based on Estimates

Applicants selected the Grants Based on Estimates Pilot procedure for only one percent of Categories A and C-G project worksheets. The overwhelming majority of applicants chose to use the normal process, whereby FEMA reconciles actual costs after the applicant completes the project. In those states where applicants used the Grants Based on Estimates procedures, some state laws and/or policies restricted how those funds could be or were disbursed to applicants in advance of the incurrence of costs. For example, one state, per state law, could only disburse a certain percentage of the project costs at the start of the project. Accordingly, while this procedure did not demonstrate, during the Pilot, that it had a conclusively material effect on expediting assistance or reducing the program's administrative burden, it did allow applicants to know, in advance, the final amount of funding FEMA was providing for their projects.

Increased Federal Share Incentive

FEMA provided training on the development of debris management plans to 3,409 state and local officials in FY 2008. Training was conducted in 21 states, as well as three territories, identified in the following list:

¹ FEMA may prepare more than one PW for every applicant.

Alabama	Illinois	Missouri	Tennessee
Arizona	Indiana	Nebraska	Utah
Colorado	Kansas	New Hampshire	Virginia
Georgia	Louisiana	North Carolina	Puerto Rico
Florida	Maryland	New Jersey	Virgin Islands
Iowa	Mississippi	South Carolina	Guam

Of those that participated in the pilot program, 98 applicants developed debris management plans and had debris contracts in place prior to a disaster. Therefore, those applicants qualified for a five percent increase in the federal cost-share for Category A, Debris Removal, PWs. In addition to receiving additional federal funds for debris removal, applicants with debris plans in place prior to the disaster were able to begin debris removal operations immediately after the disaster. FEMA did not collect any empirical data regarding how quickly these communities began and completed debris removal operations; however, the participating states agreed that having a debris management plan and pre-identified debris contractors facilitated better-organized and managed debris removal operations. FEMA will continue to provide debris management plan training to state and local officials, and anticipates a substantial number of new communities will develop debris plans this year.

Debris Recycling

There is no evidence that the recycling procedure of the Pilot program encouraged communities to develop recycling programs after a disaster occurred. The primary reason for this was the amount of time, degree of coordination, and substantial cost required to develop a recycling program, versus the urgency to complete debris removal operations as quickly as possible.

Force Account Labor

Many disaster-impacted communities (90 percent of all applicants participating in the Pilot) requested reimbursement for straight-time pay for their regular employees who monitored or performed debris removal activities. Reimbursing straight-time for an applicant's regular employees who performed debris removal work provided an incentive for applicants to complete debris removal work themselves rather than entering into contracts to perform the work.

IV. Analysis/Discussion

Section 689j of PKEMRA requires FEMA to submit a report regarding the effectiveness of the PA Pilot program. This report contains:

- An assessment of any administrative or financial benefits of the PA Pilot program.
- An assessment of the effect, including any savings in time and cost, of the PA Pilot program.
- Any identified legal or other obstacles to increasing the amount of debris recycled after a major disaster.
- Any other findings and conclusions with respect to the PA Pilot program.

Administrative or Financial Benefits of the PA Pilot Program

Grants Based on Estimates

At the time of this report, FEMA had limited empirical data to quantify any administrative savings or financial benefits associated with Grants Based on Estimates projects. Since only a few of the Grants Based on Estimates PWs are closed at the time of this report, FEMA cannot authoritatively determine if this procedure expedited the provision of assistance and reduced administrative costs associated with awarding PA grants. FEMA will review these PWs when financial data are available. However, FEMA and applicants agree that accurate cost estimates provide a better representation of actual costs at the beginning of the project formulation and grant application process. This provides FEMA and the applicant with a clearer understanding of future financial outlays.

Increased Federal Share Incentive

The Increased Federal Share Incentive procedure has the potential for administrative savings. A comprehensive debris management plan takes a significant amount of time to develop and implement at the local level. Therefore, this procedure was not widely utilized until later in the PA Pilot implementation phase. In fact, FEMA prepared 180 of the total 234 PWs for this procedure in the last four months of the PA Pilot implementation. Because FEMA closed only four of the 234 Increased Federal Share Incentive PWs at the time of this report, FEMA is unable to quantify the administrative and financial benefits of this procedure. However, all four of the closed projects used force account labor to complete debris removal and disposal work and completed the debris-related work within three months of the disaster incident period. In addition, FEMA Regions and states reported that the advance planning and organization required in developing comprehensive debris management plans encouraged applicants to be more proactive in initiating debris operations and ultimately expedited debris removal and disposal.

Debris Recycling

Applicants that participated in the Debris Recycling procedure realized a financial benefit from revenue that it retained from the salvage value of recyclable materials. For example, following severe storms, tornadoes and flooding (FEMA-1709-DR-TX), one applicant removed approximately 2,713 cubic yards of vegetative debris. It reduced the vegetative debris to 678.35 cubic yards of shredded materials, which it sold to the public. Following wildfires in California (FEMA-1731-DR-CA), an applicant recycled approximately 76 tons of scrap metal for which it received and retained \$10,013. Because of severe winter storms in Nebraska (FEMA-1739-DR-NE), an applicant performed debris removal work that resulted from damage to its electrical distribution system. It disassembled and recycled 210 damaged light fixtures for salvage. The applicant received \$1,723 for the aluminum and ballasts from the light fixtures. It also removed, salvaged, and recycled nearly four tons of damaged copper wire for a total estimated salvage value of \$11,880. This procedure also reduces the administrative requirement for applicants to separately track and report the income from recycling related to FEMA funded debris removal operations.

Force Account Labor

At this time, FEMA is unable to evaluate the closed PWs to determine whether this procedure resulted in any administrative efficiency. Based upon the widespread participation in the Force Account Labor procedure (90 percent of all of the PA Pilot projects), funding force account straight-time provided an incentive for these jurisdictions to complete the debris removal work themselves. Currently, under the normal PA program, FEMA only pays overtime for force account labor performing debris removal work. FEMA also pays all reasonable costs associated with a debris contract, which includes the cost of contract worker's regular time and overtime. FEMA Regions and states reported that grant applicants that utilized this procedure relied less on contractors, which resulted in fewer complaints and negotiations over costs and scopes of work and thus eliminated delays in accomplishing the work.

Savings in Time and Cost of the PA Pilot Program

Grants Based on Estimates

FEMA obligated funds to applicants that used Grants Based on Estimates for Category C-G work in less time than for non-Pilot Category C-G projects. On average, FEMA obligated funds for Category C-G Grants Based on Estimates projects faster than for non-Pilot Category C-G projects. Since only a few of the Grants Based on Estimates PWs are closed, FEMA cannot quantify any cost savings associated with closing Grants Based on Estimates PWs. FEMA will review these PWs later when data becomes available.

Increased Federal Share Incentive

Applicants that had comprehensive debris management plans and pre-qualified contractors realized time and cost-savings through enhanced efficiencies, fewer mistakes and reduced fraud. Based upon the small number of closed Increased Federal Share projects, it appears that

applicants with debris management plans performed timely debris removal work. For the four closed projects, applicants completed the debris-related work within three months of the disaster incident period; well under FEMA's 6-month deadline to complete debris removal work. The value of having a standardized, pre-approved debris management plan in place prior to the disaster is that it seems to allow applicants to begin operations immediately after a disaster, and in a consistent manner.

Debris Recycling

Since only a few of the recycling procedure PWs are closed, FEMA cannot quantify the total cost savings resulting from revenue that applicants received from the salvage value of recycled debris. However, as noted above, applicants that participated in a recycling program realized a financial benefit from revenue they retained from the salvage value of recyclable materials and therefore FEMA anticipates potential cost savings.

Force Account Labor

Funding the straight-time provides an incentive to applicants to better manage debris operations and decreases the number of contractors required to both perform debris operations and monitor debris removal contractors. It also reduces the amount funded for contract equipment costs and profit margins. Funding the straight-time of an applicant's employees provides additional flexibility to the local government that is contemplating a combination of contracting and force account work.

FEMA obligated funds to applicants that used force account labor for debris removal activities in less time (almost half) than for non-Pilot debris removal projects. FEMA obligated funds for debris removal projects that used the Force Account Labor Pilot procedure in 60 percent less time than for those that used contractors. Further, applicants started operations more expeditiously, and reduced or eliminated the delays related to procuring and mobilizing contractors.

Legal or Other Obstacles to Increasing the Amount of Debris Recycled After a Major Disaster

FEMA cannot make any conclusions as to whether there were any legal obstacles to increasing the amount of debris recycled after a major disaster. However, applicants that did not participate in the PA Pilot Recycling procedure identified several obstacles to recycling. Several applicants reported that debris did not have a large enough salvage value to warrant recycling. Some applicants reported that recycling debris was too costly. For example, in rural areas, it was cheaper for many communities to burn debris than to develop a recycling program. Other applicants reported that attempting to establish a recycling program during disaster recovery operations unnecessarily delayed debris operations. For example, if the applicant pays to have the debris taken to a collection or holding area where the recycling effort begins, there can be disagreements with vendors as to the costs for sorting out the recyclables and transporting it to the collection area. To avoid this problem, some applicants do not sort recyclable debris, but rather send it to permanent disposal.

Findings

Grants Based on Estimates

Several applicants requested Grants Based on Estimates for debris removal. FEMA observed that these grants were only for a portion of the total debris removal efforts in the communities, or the community had a relatively small amount of disaster-related debris. This part of the Pilot did not provide any additional insights regarding the efficacy of existing methodologies for estimating quantities of disaster related-debris. FEMA continues its efforts to develop better methodologies and tools to estimate the quantities of disaster-related debris.

Few applicants requested Grants Based on Estimates for large permanent work projects. In several states, statutes prohibit applicants from drawing down payments without first submitting cost documentation. In addition, applicants reported that they were less likely to use this procedure due to the risk that their actual project costs would exceed the estimated costs. Some applicants chose not to use the procedure due to the restrictions FEMA placed on the use of cost under runs. Acceptable uses for cost overruns included hazard mitigation projects, offsetting overruns on other eligible projects, PA-related training, and internal project management and/or administrative costs that exceeded the sliding scale.

Increased Federal Share Incentive

FEMA recognizes the benefits of advance planning for disasters and strongly supports state and local government efforts to develop debris management plans. By developing a debris management plan, communities will be better prepared to address disaster-related debris in a time-efficient manner, thereby expediting the recovery process. Additionally, a sound and properly executed debris management plan should enhance an applicant's ability to document its costs and reduce the time and administrative burden in applying for PA grant assistance.

Debris Recycling

Recycling disaster-related debris provides financial and environmental advantages to applicants. However, it is challenging for applicants to develop a program in a post-disaster environment, due to the time and costs involved. Applicants that used the recycling procedure retained the revenues generated from recycling. However, FEMA did not observe any administrative or other savings.

Force Account Labor

The Force Account Labor procedure provided applicants with an incentive to monitor or perform debris removal activities with its regular employees, rather than enter into contracts to perform the work. For over a decade, state and local applicants have requested reimbursement for straight-time salary for their regular employees who perform debris removal operations, because they do not budget for disaster-related debris removal operations. All applicants requested reimbursement for straight-time salary for regular employees.

V. Conclusion

The Grants Based on Estimates procedure allowed FEMA to implement a component of Stafford Act authority on cost estimating methodology that Congress authorized in the Disaster Mitigation Act of 2000 and for which the development of regulations is under way. Most applicants did not request Grants Based on Estimates during the Pilot because there were no compelling reasons to do so.

FEMA will continue to provide training on how to prepare debris management plans to state and local governments. Applicants that have adopted debris management plans prior to a disaster can initiate post-disaster debris removal operation quicker than those that have not.

The financial incentive to encourage recycling did not materially affect post-disaster debris removal operations. FEMA believes that the incentive will be one of many factors an applicant will consider when determining whether to develop a recycling program.

Applicants had requested that FEMA reimburse straight-time for all of its employees who perform emergency protective measures for over 15 days. The straight-time procedure of the Pilot program positively responded to the requests by authorizing the reimbursement of straight-time salary for employees who perform debris removal operation.

VI. Appendices

Appendix A: PA Pilot Program Guidance

In addition to other materials and documents developed to ensure the uniform application of the PA Pilot program procedures, the PA Pilot Program Guidance provides an overview of the PA Pilot procedures and a description of the PA Pilot program implementation and evaluation. The PA Pilot Program Guidance also includes:

- Disaster Assistance Fact Sheet 9580.400a, *Frequently Asked Questions (FAQs) Public Assistance Pilot Program*
- A description of the regulations affected by the PA Pilot procedures
- A debris management plan outline
- The Increased Federal Share Incentive checklist
- Job aids and evaluation tools, which includes an information acknowledgement form that the applicant signed indicating voluntary participation in the PA Pilot.

The PA Pilot Program Guidance, and other useful documents, is available online:

<http://www.fema.gov/government/policy/papilot.shtm>

Appendix B: Acronyms List

DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
PA	Public Assistance
PKEMRA	Post-Katrina Emergency Management Reform Act
P.L.	Public Law
PW	Project Worksheet